Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Part 97 of the Commission's	)	DA 25-219
Amateur Radio Service Rules	)	GN Docket No. 25-133

I. INTRODUCTION

Greetings,

I am an ARS operator and Broadcast Engineer after having retired from the Aerospace Avionics industry and as a professor of physics. I hold an ARS license, AC0OB, and a General Radio and Telephone Operator Licanse (GROL) ticket. My main interests to-date are the restoration and upgrading of both commercial and amateur radio equipment.

II. BACKGROUND

The comment is in response to the **FCC's Broad Inquiry on Rules to Delete or Amend.** Specifically, these comments relates to the latter.

III. DISCUSSION of Amendment

I strongly suggest that we amend power regulations for Part §97.313(a,b) which would read as follows:

§97.313 Transmitter power standards

The holders of Amateur Radio Operator licenses of General or Extra Class qualifications is limited to a maximum transmitting power of:

(a) where expressed as direct-current input power, 1,000 W to the anode, drain or collector circuit of the transmitter stage that supplies radio frequency energy to the antenna port;

or

(b) where expressed as radio frequency output power measured across an impedance-matched load,

(i) 2,250 W peak envelope power for transmitters that produce any type of single

sideband emission, or
(ii) 750 W carrier power for transmitters that produce any other type of emission.

(iii) For A3E emissions, i.e., amplitude modulation at "full carrier," the sideband-to-carrier power ratio shall not exceed 50%.

No other changes are suggested for **§97.313** (c-m).

IV. Summation

This is but one of the amendments that will bring clarity to the FCC’s Part 97 ARS rules.

Respectfully submitted for your consideration,

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March 23, 2025